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Counsel to Robert S. Rosenfeld, in his capacity as Plan Administrator of Dowling College

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NEW YORK

In re : Chapter 11

.

DOWLING COLLEGE, : Case No. 16-75545 (REG)

f/d/b/a DOWLING INSTITUTE,

f/d/b/a DOWLING COLLEGE ALUMNI

ASSOCIATION, :

f/d/b/a CECOM,

a/k/a DOWLING COLLEGE, INC.,

:

Debtor.

CERTIFICATE OF NO OBJECTION WITH RESPECT TO THE PLAN ADMINISTRATOR'S MOTION SEEKING ENTRY OF AN ORDER (I) DISCHARGING THE PLAN ADMINISTRATOR AND HIS PROFESSIONALS OF ANY FURTHER DUTIES IN THE CHAPTER 11 CASE AND (II) CLOSING THE CHAPTER 11 CASE AND ENTERING A FINAL DECREE

Pursuant to Rule 9075-2 of the Local Bankruptcy Rules for the Eastern District of New York, the undersigned hereby certifies as follows:

1. On July 22, 2022, Robert S. Rosenfeld, in his capacity as Plan Administrator for Dowling College ("Dowling" or the "Debtor") filed the *Plan Administrator's Motion Seeking Entry of an Order (I) Discharging the Plan Administrator and His Professionals of any Further Duties in the Chapter 11 Case and (II) Closing the Chapter 11 Case and Entering a Final Decree*

(the "Motion") [Docket No. 779] and Notice of Hearing on Plan Administrator's Motion Seeking Entry of an Order (I) Discharging the Plan Administrator and His Professionals of any Further Duties in the Chapter 11 Case and (II) Closing the Chapter 11 Case and Entering a Final Decree (the "Notice of Hearing") [Docket No. 779-2].

- 2. Pursuant to the Notice of Hearing, any responses to the Motion were to be filed no later than August 15, 2022 at 5:00 p.m. (EST) (the "Objection Deadline").
- 3. The Plan Administrator caused the Motion and Notice of Hearing to be served on July 22, 2022, as reflected in the declaration of service filed with the Court [Docket No. 780].
- 4. As of the date hereof, which is more than forty-eight (48) hours after the Objection Deadline, no objection or responsive pleading has been served upon the undersigned. Additionally, the undersigned has reviewed the Court's docket in this case and no objection or responsive pleading has been filed with the Court. Lastly, the undersigned is unaware of any objection, respective pleading or request for a hearing with respect to the Motion.

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Based on the foregoing, the Plan Administrator respectfully request that the Court enter the proposed order, attached to the Motion as <u>Exhibit A</u>, without a hearing.

Dated: New York, New York August 17, 2022

KLESTADT WINTERS JURELLER SOUTHARD & STEVENS, LLP

By: /s/ Lauren C. Kiss

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